

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION)
OPIATE LITIGATION)
) MDL No. 2804
THIS DOCUMENT RELATES TO:) Case No. 17-md-2804
)
Track Three Cases)

VIDEOTAPED DEPOSITION OF MELANIE BLASKO
Conducted via Zoom
Mentor, Ohio
Tuesday, February 2nd, 2021

REPORTED BY: GREG S. WEILAND, CSR, RMR, CRR
JOB NO.: 4419118

1 subpoena.

2 And what I'm hearing from you, until you
3 were served the subpoena, did you not consider that
4 to be pending litigation as related to LGRC,
5 correct?

6 A. Correct.

7 Q. I want to talk to you a little bit about
8 some general terms so that when we move further, we
9 have an understanding of your definitions and your
10 view on opioid issues.

11 Do you have an understanding of what an
12 opioid is?

13 A. Yes.

14 Q. What is your understanding?

15 A. Well, they include painkillers, legally
16 prescribed, so oxycodone, Oxycontin. And then
17 illegal, heroin, those that are synthetic, fentanyl,
18 some of the other street drugs.

19 Q. Okay. So you understand there's both
20 prescription and illicit opioids, correct?

21 A. Yes.

22 Q. And you're aware that prescription opioids
23 are legal medications, correct?

24 A. Yes.

25 Q. And you understand that they can be sold

1 legally in the United States with a valid
2 prescription --

3 A. Yes.

4 Q. -- correct?

5 Are you aware that opioids are approved by
6 the FDA?

7 A. Yes.

8 Q. And do you have an understanding that
9 prescription opioids may help patients suffering
10 from acute and chronic pain?

11 A. Yes.

12 Q. And are you -- do you have an
13 understanding that doctors in Lake and Geauga County
14 prescribe opioids to patients who are suffering pain
15 or other medical issues?

16 A. Yes.

17 Q. Do you have an understanding that a vast
18 majority of the Lake and Geauga County residents who
19 use prescription opioids are doing that lawfully
20 under the care of their doctor?

21 MS. POLLOCK: Object to form.

22 THE WITNESS: Well, do I have an
23 understanding? I mean, when you are talking
24 about everybody in Lake and Geauga --
25 Lake Counties, I would assume they're following